

BEFORE THE  
POSTAL REGULATORY COMMISSION

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Periodic Reporting  
(UPS Proposals One, Two, and Three)

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: Docket No. RM2016-2

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UNITED PARCEL SERVICE, INC.'S MOTION FOR  
EXTENSION OF TIME TO RESPOND TO CHAIRMAN'S  
INFORMATION REQUEST FOUR

(December 18, 2015)

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United Parcel Service, Inc. ("UPS") respectfully submits this motion to extend the deadline for UPS to respond to Chairman Information Request No. 4 from December 31, 2015 to January 8, 2016.

ChIR No. 4 requests information about, among other things, UPS's own cost allocation practices. While UPS does not object to answering these questions, doing so will require the involvement of multiple personnel to ensure that the answers are both accurate and appropriate in light of the potentially sensitive nature of the information requested. The additional time (just over one week) is necessary to ensure that UPS's responses can be informed and reviewed by the appropriate personnel.

The current deadline for UPS's response, December 31, 2015, is the same day as the end of the financial quarter and fiscal year for UPS, a public company. Management and employees not dedicated to supporting peak parcel volumes at this time are, therefore, occupied with reviewing and preparing financial reports for public filings and the investor community. In addition, certain personnel whose involvement is

necessary to respond to the request have plans to be away during some or all of these holiday weeks.

UPS submits that the short extension will not cause prejudice to the Postal Service or any other interested party because these requests originated with the Commission, and not with the Postal Service or any other party. Moreover, even with the extension, the Postal Service and interested parties will still have the opportunity to review and consider UPS's response for 12 days before initial comments are due in this docket on January 20, 2016.

UPS requested the Postal Service's position on the extension. The Postal Service states: "UPS is authorized to represent that the Postal Service does not object [to] this extension in principle, but is concerned that the delay conceivably might interfere with full integration of potential responsive material into the Postal Service's initial comments on January 20<sup>th</sup>. Therefore, the Postal Service wishes to condition its agreement to this extension with an understanding that, if necessary, the Postal Service may seek an extension of up to one week in order to supplement its initial comments specifically with respect to any material provided by UPS in response to ChIR No. 4."<sup>1</sup>

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<sup>1</sup> As a courtesy, even though these requests did not originate with Amazon, UPS also inquired about Amazon's position on UPS's request for the extension. Amazon opposes the request.

Respectfully submitted,

UNITED PARCEL SERVICE, INC.,

By: /s/ Steig D. Olson

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